

EXHIBIT B

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Compañía del Bajo Caroni (Caromin), C.A., and
V.M.C. Mining Company, C.A.,

Plaintiffs,

v.

Bolivarian Republic of Venezuela and
Ministry of Basic Industries and Mines,

Defendants.

Case No. 07-CV-3179 (NRB)

DECLARATION OF JANIS H. BRENNAN

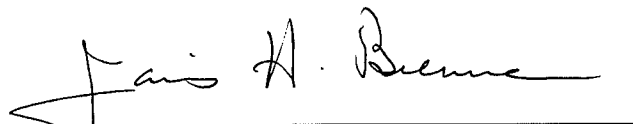
I, Janis H. Brennan, an attorney duly-admitted to practice law, declare:

(1) I am a member of the bar of the District of Columbia and a partner in the firm Foley Hoag LLP, counsel to Defendants the Bolivarian Republic of Venezuela and Ministry of Basic Industries and Mines in the above-captioned matter. I make this declaration in support of Defendants' Reply to Plaintiffs' Opposition to Defendants' Motion to Dismiss the Complaint.

(2) Attached hereto is a true and correct copy of the Laboratory Report of William J. Flynn, Senior Forensic Document Examiner, Affiliated Forensic Laboratory, dated November 19, 2007, containing Mr. Flynn's analysis of the "Addendum" at issue in this case and the documents submitted by Plaintiffs as Exhibit 4 to the October 12, 2007 Declaration of Manuel A. Fernandez and Exhibit D to the October 10, 2007 Declaration of Adrián Zerpa León.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Washington, D.C.
November 20, 2007



Janis H. Brennan

Affiliated Forensic Laboratory

Questioned Document Examinations

Laboratory Report

Laboratory Report #07-9681.1

November 19, 2007

QUESTIONED DOCUMENTS

- Q-1. Color machine reproduction of a three-page ADDENDUM from the Ministerio de Energia y Minas bearing an alleged signature of Rafael Ramirez dated 19 de diciembre de 2003.
- Q-2. Copy of a three page letter allegedly from Francisco Salas to Dr. Julia Van Der Brule in regards to an Executive Summary.
- Q-3. Copy of a document dated 18 December 2003 to Julia Van Den Brule bearing an alleged signature of Rosa Toro, Consulatoria Juridica.

KNOWN DOCUMENTS

- K-1. Compact Disc containing digital images taken during Alan Robillard examination of the questioned document, Item Q-1.
- K-2. Twenty original signature exemplars of Rafael D. Ramirez dated 15 August 2007.

EXAMINATION REQUESTED

Determine if there is forensic evidence indicating that there are anomalies associated with the creation of Items Q(1-3) and, if so, any significance that can be attributed to these anomalies. If possible, determine authorship of the questioned "Ramirez" signature appearing on Item Q-1.

RESULTS OF THE EXAMINATION

Examination of the questioned Items Q(1-3) and Items K(1&2) have resulted in the following conclusions and observations:

Item Q-1:

1. The document that was examined was a color reproduction rather than an original document. As a result, some of the forensic evidence that might have been obtained from

an examination of the paper and printing processes could not be determined. Only those examinations which could be reliably conducted from the submitted documents were performed.

2. Page #2 of the Addendum appears to have been originally produced on an inkjet printer. The evidence supporting this finding is the apparent smearing of the word "QUINTA" and portions of "partir del" on the line above.
3. Pages #1 and #2 of the Addendum are set at the same typographic line spacing. Page #3, however, is set at a measurably smaller (tighter) line spacing. Because there is a paragraph wrap from page #2 to page #3, there is no logical reason for the line spacing to have changed if the document had been prepared as one contiguous item.
4. Pages #1 and #3 have the same horizontal line length, while page #2 has a longer line length. As in the case above, there does not appear to be a logical reason why the line length of a fully justified document would change from page to page if created in a normal fashion.
5. The signature block "Ing. RAFAEL RAMIREZ" does not fall on the typographic line spacing utilized on the remainder of page #3. This frequently occurs when a signature is "lifted" from one document and mechanically or electronically pasted onto another.
6. Images of the first generation copy of the questioned Addendum show that there is a resolution or density difference between the text of the document and the phrase "Ing. RAFAEL RAMIREZ" (See the attached image). There is no logical reason for black text of the same size and font to be rendered differently within one document if it is created in a normal manner. (*See attachments 1 a and b*)
7. Because the original document was unavailable for examination, it was not possible to determine if the signature appearing on the Addendum was authentic AND human-made, authentic BUT cut-and-pasted, or a simulated forgery. Because both electronic and mechanical cut-and-paste forgeries typically use an authentic signature as the model that is transferred to the fraudulent document, it can be forensically impossible to determine if the signature appearing on a questioned document has been transferred to it or actually signed. (*See attachment 2*).

SUMMARY:

There are multiple anomalies associated with the questioned Addendum that are typically found in manipulated documents. The change in vertical line spacing, for instance often occurs in page substitution cases wherein pages from different documents are "mixed-and-matched." The typical example is one in which a signature page from one document (or just the signature from a document) is appended with newly created pages to create a document that was never signed by the victim. In the opinion of the undersigned there IS forensic evidence indicating that Item

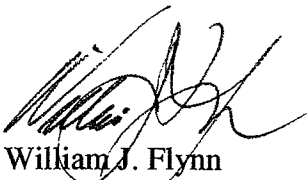
Q-1 has either had data on the various pages manipulated or has had the signature transferred from another document.

Item Q-2:

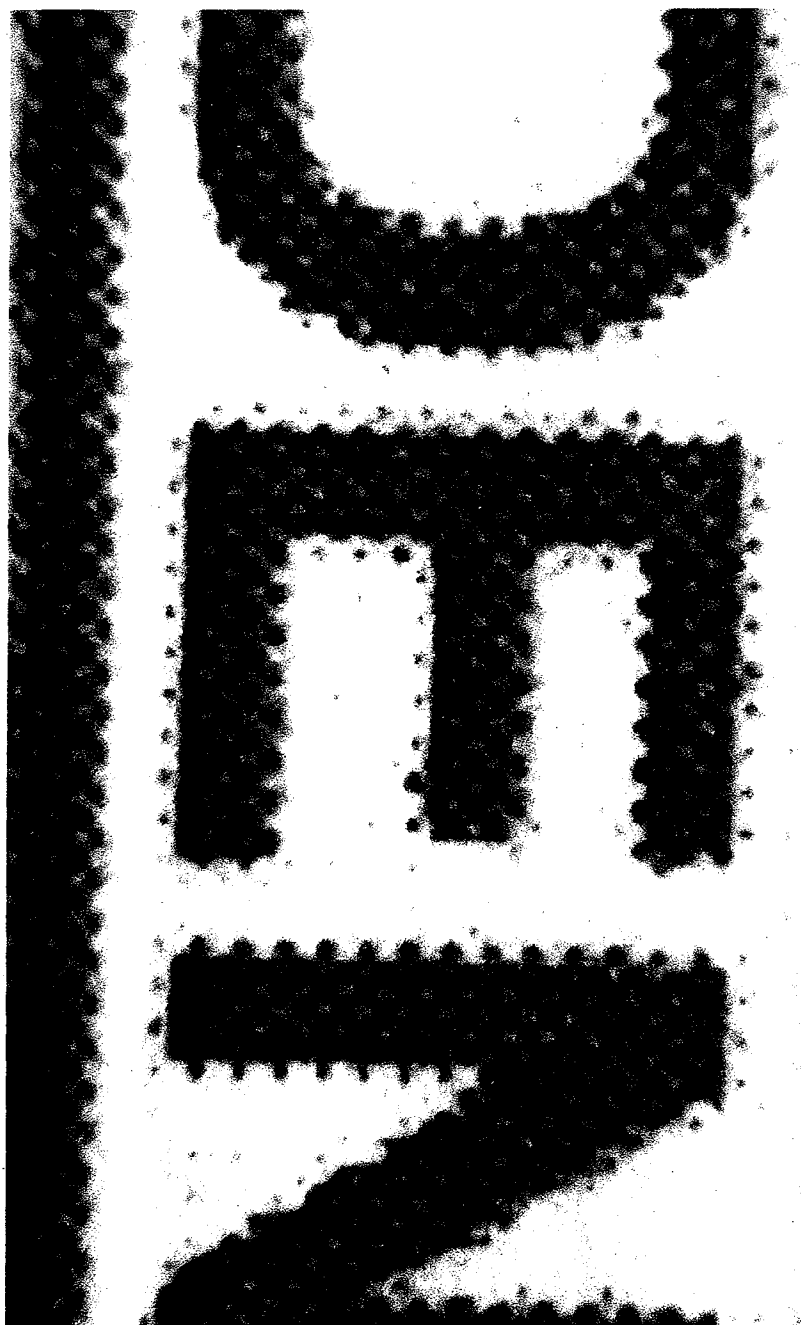
1. All three of the pages of this document fall on the same typographic line spacing. As was true in the case of the Q-1 document, however, it cannot be determined from a reproduction if the Francisco Salas signature on page #3 has actually been affixed in a normal manner or transferred to Q-2 by means of a cut-and-paste forgery.

Item Q-3:

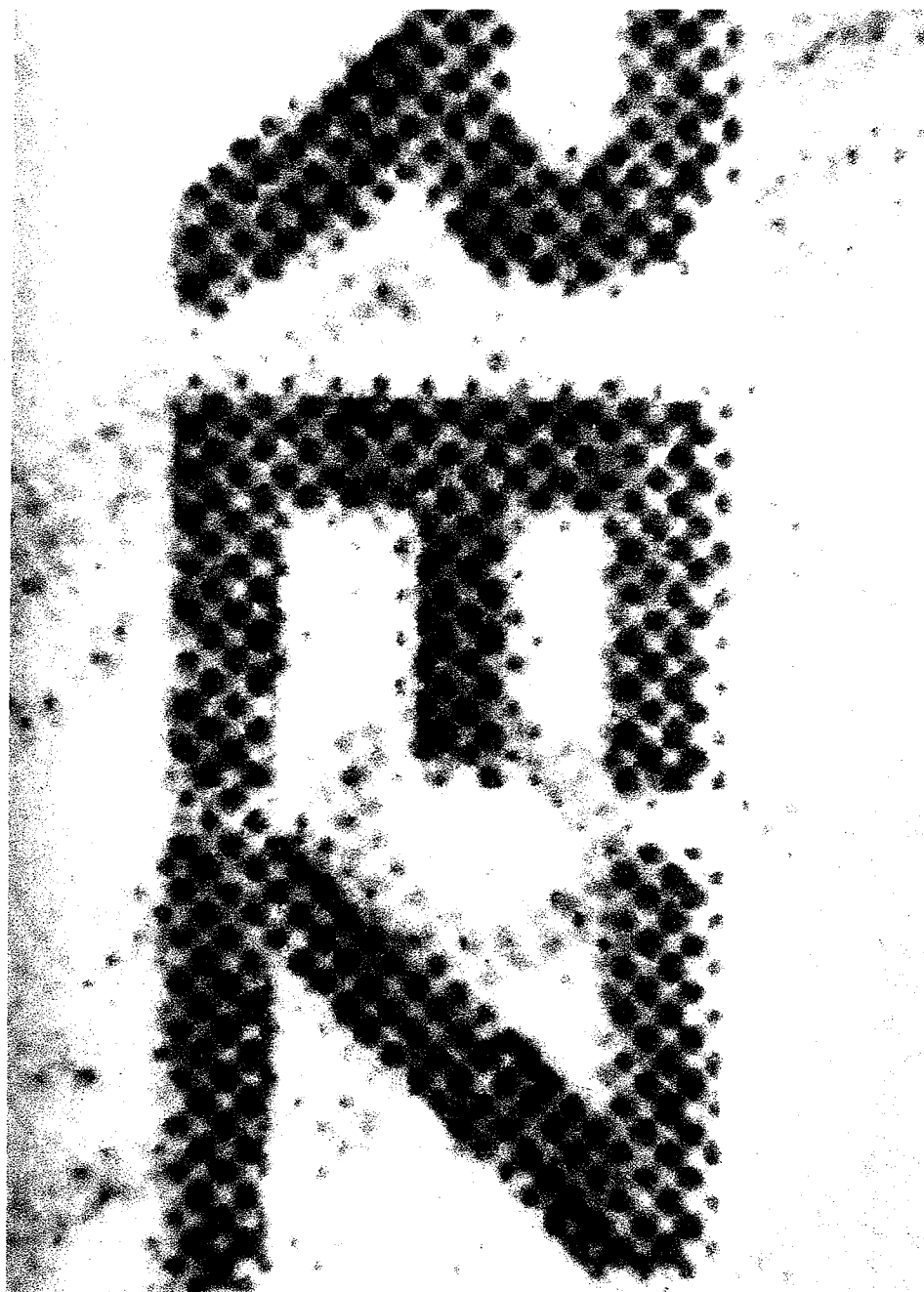
1. The copy submitted for examination contained what appears to be a background dithering pattern. Without an original document to examine, however, it is not possible to determine why this has occurred.
2. All of the text appearing on this document, from the date "18 12 2003" through the phrase, "Sin mas a que hacer referencia" are in typographically uniform line spacing. (See the attached image). The signature block data, "Atentamente, ROSA TORO, Consultoria Juridica," however, does not fall on the typographic line spacing utilized throughout the document. In addition the signature block text has a rotational misalignment with the other machine prepared text. It is likely therefore, that the signature block data has been affixed to this document in an unnatural manner. In the opinion of the undersigned, the vertical and rotational misalignment of the signature block text constitute evidence indicating that the signature block has been appended to this document rather than prepared and signed in a normal manner. (*See attachment 3*)



William J. Flynn
Senior Forensic Document Examiner
WJF:cmk



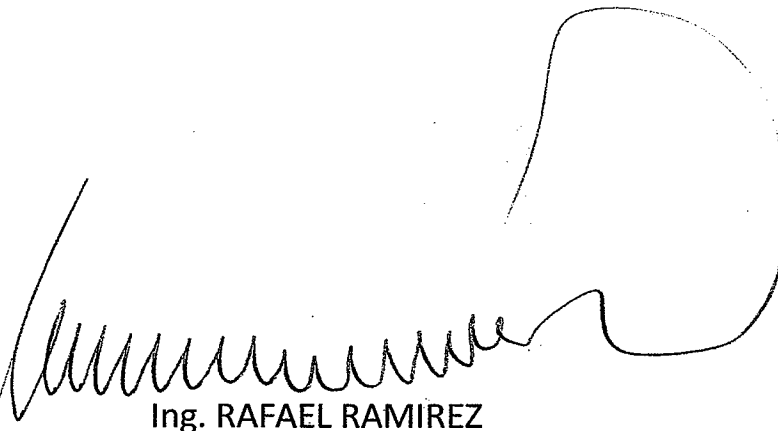
#1A



Let the legal representative of the aforesaid companies be notified, who shall sign at the bottom in token of agreement.

Let it be added to the separate folder of the administrative case file bearing number 2084.

In Caracas, this nineteenth (19th) day of the month of December, two thousand and three (2003).



Ing. RAFAEL RAMIREZ

I accept the terms and conditions set forth above
Date:12/22/2003

Delivered by the Mining
Processing Division
12/22/2003

#2

10.4 pt. GRID

REPÚBLICA BOLIVARIANA DE VENEZUELA
MINISTERIO DE ENERGÍA Y MINAS
CONSULTORIA JURÍDICA

Caracas, 18.12.2003

PARA: Abg. JULIA VAN DEN BRULE
Asistente del Ministro

ASUNTO: OBSERVACIONES AL DOCUMENTO COMPLEMENTARIO
(ADDENDUM) DEL PLIEGO DE CONDICIONES (CONCESIONES
ALFA Y DELTA)

A los fines de dar respuesta a Nota de Remisión S/N, le remito debidamente
revisado el borrador del Addendum para la firma del Ministro, como complemento al
Pliego de Condiciones suscrito en reunión sostenida en fecha 17 de diciembre del
presente año, y a solicitud del representante legal de las empresas COMPAÑIA
MINERA DEL BAJO CARONI, (CAROMINI), C.A. y VBC MINING COMPANY, C.A.

Al respecto, le señalo que como abogada de la Consultoría Jurídica de este
Ministerio y miembro del grupo de trabajo que redactó el Pliego de Condiciones, no
tengo observaciones que formular al documento en cuestión, salvo las sugerencias
de forma que previamente fueron conversadas vía telefónica con usted.

Sin más a que hacer referencia.



Atentamente,

ROSA TORO

Consultoría Jurídica

Anexo: 1.0 indicado.

<u>Court Type</u>	<u>Jurisdiction</u>	<u>Date</u>	<u>Citation</u>
Deposition	Phoenix, AZ	11/18/2002	Luckenbill v. Circle City/Morristown, et al.
Municipal (City)	City of Phoenix	1/13/2003	Michael Shelley (deceased), Sherrie Shelley, Melissa Alvey v. Leslie
Municipal (City)	Maricopa County	1/15/2003	Estate of Joe Len Gary, personal representative: Clara Dean; other party:
Municipal (City)	Phoenix	5/19/2003	David Curtice v. Gerald Perkins
Municipal (City)	Phoenix	4/15/2003	Freeman vs Battersby, et al
Federal Court	Phoenix	5/9/2003	US v. Mark Branon (attempted murder)
Superior (County)	Maricopa County (AZ)	9/8/2003	Dennis Michael White, Joseph Deluca, Melissa Zimmerman
Superior (County)	Maricopa County (AZ)	9/9/2003	Edwin Kauss (deceased), Elissa LaCondo v. Plaza Healthcare, et. al.
Superior (County)	State of Michigan	11/20/2003	Altered Table Games Scratch-N-Win
Federal Court	Phoenix, AZ	3-23-2004	US v. Buckner, et al.
Federal Court	Phoenix, AZ	4-23-2004	United States v. Jeffrey H. Feingold, N.D.
Deposition	Miami, FL	12/3/2004	Caswell v. Wynne
Superior (County)	Maricopa County	1/5/2005	Maricopa County vs. Michael David Lucas
Deposition	Phoenix, AZ	1-24-2005	Lucero v. Perez
Federal Court	Arizona	1-26-2005	Stephen Leivas, Robbin Leivas v. Raynold Simoes, Am-Cor Carpets, J.A.
Superior (County)	Maricopa County	2/9/2005	Lucero v. Perez
Deposition	San Francisco, CA	2/22/2005	Joy Hu v. Sherman Ting
Superior (County)	Maricopa County Probate Court	3/4/2005	Estate of Philip Ketcham v. Rosa Lazaro
Deposition	Salt Lake City, UT	6-21-2005	Estate of Miriam Bushnell
Superior (County)	Maricopa County	7-15-2005	Estate of Gladys Harriet Maynard, Priscilla A. Wheeler (Special
Deposition	Phoenix, AZ	08/05/2005	British Petroleum, et al. v. Bridgestone/Firestone, et al.
Deposition	Tucson, AZ	10/27/2005	David Johnson v. Gyorke & Radiology Ltd.
Superior (County)	Albuquerque, NM	12/7/2005	Dorothy and Janet Grooms v. Larry V. Johnson, John Hancock, Signator
Superior (County)	Maricopa County	1/5/2006	Robert Burns v. Stacey Whitmore Burns
Federal Court	Phoenix, AZ	1/9/2006	Roberts Properties, Ltd, Barbel Roberts, Craig T. Suddart v. Gary
Administrative	Phoenix, AZ	1/27/2006	Dr. Rizalina Llanes-Rodas v. Merrill Lynch, David Von Stahle

11/15/2007

William J. Flynn - Affiliated Forensic Laboratory

5-Year Testimony Report

<u>Court Type</u>	<u>Jurisdiction</u>	<u>Date</u>	<u>Citation</u>
Justice Court	Central Phoenix	2/24/2006	Deloach v. William Zachow, M.D.
Deposition	Phoenix, AZ	4/27/2006	Lourdes Gastelum & Carlos Montes Hernandez, (Mirka Lourdes Montes
Deposition	Phoenix, AZ	5/1/2006	Alicia Quintero v. Banner Hospital, Dr. Charlie Hecht, Dr. Paul
Deposition	Palm Beach, FL	4/19/2006	Melissa MacDonald v. Woman's Medical Associates, West Boca Medical
Deposition	Phoenix, AZ	5/1/2006	Estate of Jose Frias v. Highland Manor Nursing Home, Mariner
Deposition	Naples, FL	6/6/2006	Mary Catherine Tourtillott v. Dr. Jeffrey Lang, M.D.
Superior (County)	Los Angeles County	6/13/2006	Burnie Allen v. Gary Allen
Deposition	Phoenix, AZ	9/7/2006	Albert M. Coury Trust (Christopher, Anthony & Jonathan Coury) (Client)
Deposition	Phoenix, AZ	10/25/2006	Coplan v. Gettleman
Deposition	Phoenix, AZ	10/26/2006	Coplan v. Gettleman
Deposition	Anchorage, AK	12/6/2006	AIC v. PDI/Elisworth
Deposition	Phoenix, AZ	12/5/2006	Sheila & Larry Land v. William Riley, M.D., Biltmore Healthcare
Deposition	Phoenix, AZ	12/21/2006	Laramore v. Havasu Regional Medical Center
Deposition	Phoenix	1/30/2007	Pauline Bustos (personal rep. for Ignacia Aguirre) v. Lindy Akes, MD
Deposition	Phoenix	2/23/2007	Robert Cox, Conservator for Dorothy Cox v. American Retirement Corp,
Federal Court	Arizona (Phoenix)	4/20/2007	Post Integration Systems adv. Nelcela Merchant Trans. Systems, Inc., et
Superior (County)	NE Regional Court Maricopa Co.	7/11/2007	Tan v. Hacienda, Inc. CV2005-053523
Superior (County)	Anchorage, AK	8/8/2007	AIC v. PDI/Elisworth
Superior (County)	First Judicial District Court Div. 5	8/20/2007	Pauline Bustos (personal rep. for Ignacia Aguirre) v. Lindy Akes, MD
Deposition	Phoenix	8/23/2007	Gerald Montoya v. Dr. Auge
Deposition	Phoenix	8/24/2007	Costin v. St. Lukes, Dr. Juarez

FEE SCHEDULE & RETAINER POLICY

Examination, Analysis, Report Preparation

Medical Malpractice Retainer Fee: **\$2,250**

Non-Medical Malpractice Retainer Fee per case: **\$2,000**

****Casework exceeding retainer rate will be billed at \$250.00 per hour.**

Depositions

Minimum Fee within Phoenix Metro Area: **\$500**

Minimum Fee within Maricopa County, outside Phoenix Metro Area: **\$750**

Minimum Fee outside Maricopa County, within Arizona: **\$1,000**

****Actual billing will be based on a rate of \$350 per hour.**

Minimum Fee outside of Arizona State Per Day: **\$2,000**

****Testimony in excess of 8 hours, per day will be billed at \$350 each additional hour.**

Court Appearances & Testimony

Minimum Fee within Phoenix Metro Area: **\$500**

Minimum Fee within Maricopa County, outside Phoenix Metro Area: **\$750**

Minimum Fee outside Maricopa County, within Arizona: **\$1,000**

****Actual billing will be based on a rate of \$250 per hour.**

Minimum Fee outside of Arizona State Per Day: **\$1,600**

****Testimony in excess of 8 hours, per day will be billed at \$250 each additional hour.**

**MINIMUM FEE RETAINERS MUST BE PAID IN ADVANCE AND PRIOR TO MY
DESIGNATION AS YOUR EXPERT WITNESS.
RETAINER FEES ARE NON-REFUNDABLE**

WILLIAM J. FLYNN, BS, D-ABFDE

Affiliated Forensic Laboratory

Specializing in the Forensic Examination of Questioned Documents

P.O. Box 33608 ■ Phoenix, AZ 85067 ■ 602-241-1890 ■ (Fax) 602-241-1932

WILLIAM J. FLYNN, B.S., D-ABFDE

Forensic Document Examiner

Curriculum Vitae

EXPERIENCE (CIVIL):

October 1983 - Present:

**PRESIDENT AND CEO - AFFILIATED FORENSIC
LABORATORY, INC.**

Founded and Incorporated Affiliated Forensic Laboratories in 1983 to provide the legal and business communities with professional forensic questioned document services.

January 1973 - September 1983:

Private civil practice in Questioned Document Examination - Phoenix, Arizona

EXPERIENCE (CRIMINAL):

Jan 1973 - July 1991:

**QUESTIONED DOCUMENT SUPERVISOR - ARIZONA
DEPARTMENT OF PUBLIC SAFETY.**

Supervising Analyst, Arizona Department of Public Safety, Questioned Document Laboratory. Was responsible for determining authorship of questioned handwritings and handprintings; detecting alterations, additions, interlineations, chemical and mechanical erasures, evidence of tracings or other tampering with original documents. Used stereoscopic microscopes, test plates, infrared, ultraviolet and other spectral devices and video conversion equipment. Conducted counterfeit detection, ink and paper analyses. Have qualified and rendered expert testimony in Federal, State, and Municipal courts throughout the United States. Prepared court exhibits to illustrate my conclusions at these judicial proceedings. Lectured on related subjects for law enforcement and citizen groups.

Supervised and evaluated subordinate document examiners, as well as trained apprentice examiners. Conducted research in the field to further the science of questioned document examination.

February 1965 - December 1972:

**QUESTIONED DOCUMENT EXAMINER/SERGEANT -
PHILADELPHIA POLICE DEPARTMENT CRIME
LABORATORY**

Initially hired as a Patrolman with the Philadelphia Police Department. After two and one half years was promoted to Detective and subsequently assigned to the Crime Laboratory as a Questioned Document Examiner trainee. Completed apprenticeship in 1970 and was promoted to Detective Sergeant/Questioned Document Examiner. Remained in that capacity until joining the Arizona State Crime Laboratory in January of 1973.

SPECIALIZED TRAINING COURSES IN QUESTIONED DOCUMENTS:

**SOUTHWESTERN ASSOCIATION OF FORENSIC
DOCUMENT EXAMINERS / ASQDE / ABFDE**

- a. Medical/Legal Symposium on the Forensic Examination of Medical Records and Testimony Related to Medical Malpractice Cases – Miami, FL, May 1997.
- b. Identification of typewriter fonts utilizing the Bouffard Electronic Database System - Dr. Bouffard 1994
- c. Forensic Paper Identification Symposium - Mead Paper Co. 1992

**FEDERAL BUREAU OF INVESTIGATION, TRAINING
ACADEMY, QUANTICO, VIRGINIA:**

- a. Typewriter Identification School - 1987.
- b. International Symposium on Questioned Documents - 1985.
- c. Legal Aspects of Questioned Document Examination - 1978.
- d. Questioned Document Laboratory Photography - 1975
- e. Survey of Questioned Document Examiners - 1974.

**INSTITUTE OF PAPER CHEMISTRY, APPLETON
WISCONSIN:**

- a. Forensic Identification of Paper - 1973.

U.S. SECRET SERVICE, WASHINGTON, D.C.:

- a. Questioned Document School - 1970.

**PHILADELPHIA POLICE DEPARTMENT CRIME
LABORATORY:**

- a. Two year apprenticeship with the Chief Document Examiner for the Philadelphia Police Crime Laboratory - 1968 through 1970

**PENNSYLVANIA STATE POLICE DOCUMENT
LABORATORY:**

- a. Initial Questioned Document Training with the Chief Document Examiner for the Pennsylvania State Police Laboratories, 1968.

CONTINUING TRAINING:

Over the past thirty four years, have attended, and/or conducted, more than ninety seminars, training workshops, scientific symposia, and professional meetings involving such organizations as: The American Academy of Forensic Sciences, American Society of Questioned Document Examiners, American Board of Forensic Document Examiners, Southwestern Association of Forensic Document Examiners, and the International Association for Identification.

PROFESSIONAL AFFILIATIONS:

Member - American Academy of Forensic Sciences

Member – American Society of Questioned Document Examiner

Member – Southwestern Association of Forensic Document Examiners (President 1985-1987)

Librarian/Historian - Southwestern Association of Forensic Document Examiners. (1981 - Present)

President - American Board of Forensic Document Examiners (1989 - 1991)

EDUCATION and CERTIFICATIONS:

B.S., University of Phoenix (Computer Information Systems)

Board Certified by the American Board of Forensic Document Examiners.

COURT QUALIFICATIONS:

Qualified as a Questioned Document Examiner in Federal, State and Municipal Courts throughout the United States. Have also testified as an expert in Europe and the Middle East.

PAPERS PUBLISHED:

- a. “The Illusion of Traced Forgery on Zinc Oxide Photocopy Paper” - *Journal of Police Science and Administration* - Vol. 2:No.3 Dec. 1974.
- b. “Forgery by Phone” - *ibid.* Vol. 4:No.3 Sept. 1976.
- c. “PaperMate’s New Erasable Ink Pen” - *ibid.* Vol. 7:No.3 Sept. 1979.
- d. “Instant Winner Lottery Tickets - Examination and Testing Procedures” Presented at the AAFS Meeting Feb. 1988.
- e. “Laser Printers - Nemesis of the ‘90’s” Co-authored with Robert G. Lockard. Presented at the ASQDE Meeting Aug. 1990.
- f. “Typography for Document Examiners” - Presented at the Fall 1991 meeting of the Southwestern Association of Forensic Document Examiners.
- g. “Light, Color, and Filters” – biannual publication of the Southwestern Association of Forensic Document Examiners - 1992.
- h. “Utilizing Computer Generated Graphics as an Aid to Expert Testimony” Presented at the Fall 1992 meeting of the Southwestern Association of Forensic Document Examiners.

- i. "Identification of Non-Impact Printing Devices" - Published as a series (1993-1994) in the *ABFDE NEWS* the quarterly publication of the American Board of Forensic Document Examiners.
- j. "Light, Color, and Filters Revisited" – biannual publication of the Southwestern Association of Forensic Document Examiners Vol. XII-#3, Fall 1993 co-authored with Gerald B. Richards, F.B.I. Laboratory, Wash. D.C.
- k. "Electronic Typography for Document Examiners (update)" - Presented at the 52nd annual meeting of the American Society of Forensic Document Examiners. August 1994
- l. "Production and Utilization of Computer Generated Court Exhibits for Document Examiners" Presented as a workshop at the Southwestern Association of Forensic Document Examiners meeting, Spring 1995
- m. "Widows and Orphans Provide Clues as to Facsimile Transmission Methodology" – *ABFDE NEWS* the quarterly publication of the American Board of Forensic Document Examiners (Spring 1995)
- n. "Measurement of Repeating Image Defects as a Method for the Identification of Hewlett Packard Laser Printers" – *ibid.* (Spring 1996)
- o. "Hewlett Packard's Printer Control Language - PCL" – *ibid.* (Summer 1996)
- p. "Using Digital Photography for Courtroom Presentations". Talk presented at the spring 1997 meeting of the Southwestern Association of Forensic Document Examiners.

EXAMINATIONS:

During the past thirty four years I have either written or reviewed (as Senior Analyst) more than 19,500 Questioned Document laboratory reports including those for some of the following agencies:

FEDERAL AGENCIES:

U.S. Treasury Dept., U.S. Secret Service, Federal Bureau of Investigation, U.S. Dept. of Immigration and Naturalization, United States Attorney's Offices, U.S. Postal Service, United States Internal Revenue Service, U.S. Bureau of Alcohol Tobacco and Firearms, U.S. Drug Enforcement Administration, U.S. Army C.I.D., U.S. Air Force O.S.I., U.S. Department of Agriculture, U.S. State Department, U.S. Department of Justice, U.S. Department of Defense.

STATE AGENCIES:

More than fifty (50) different State Agencies in Arizona, New Mexico, California, Nevada, Colorado, Utah, Montana, North Dakota, Georgia, Pennsylvania, Alaska and Guam.

MUNICIPAL AGENCIES:

More than sixty (60) different Municipal Law Enforcement Agencies in Arizona as well as most of the Agencies in the five county area around Philadelphia, Pennsylvania.

PRIVATE PRACTICE:

More than a thousand cases worked for attorneys in civil litigations, as clients of Affiliated Forensic Laboratory's private practice.

AWARDS:

More than 220 letters of commendation from the various U.S. Government Agencies, State Agencies, County Government and Municipalities for whom documents have been examined and/or testimony rendered.

TEACHING ACTIVITIES:

1990 - Present:

Guest lecturer, National Association of Legal Investigators Seminar, "Blazing the Investigative Trail," Scottsdale, AZ, 1/26/01

Guest lecturer, International Association of Internal Auditors Conference, Atlanta, GA.

Guest lecturer, International Association of Internal Auditors Conference, Phoenix, AZ.

Guest lecturer, American Medical Records Association, Casa Grande, AZ.

Guest speaker Medical Records Litigations (ATLA), Steamboat Springs, CO.

Conducted a series of seminars and workshops for forensic document examiners concerning computer printing devices and electronic typography (1992-Present)

Guest Lecturer, International Association of Credit Card Investigators, Scottsdale, AZ

1975 - 1991:

INSTRUCTOR - CRIMINAL JUSTICE AGENCIES:

Advanced Investigator's training for all law enforcement agencies in Arizona at the ALETA Academy.

Numerous classes and symposia for Maricopa County Bar Association, American Trial Lawyers Association, DES, Phoenix Police Academy, Arizona Attorney General's Office, U.S. Internal Revenue Service, etc.

1973 - 1991:

INSTRUCTOR - PHOENIX COLLEGE, AND AMERICAN INSTITUTE OF BANKING:

Conducted a course of instruction at Phoenix College for fourteen years, dealing with investigation of document crimes, forgery and counterfeiting matters through the Administration of Justice Department. Conducted Forgery and Counterfeiting seminars for the American Institute of Banking. Taught Computer Science courses at Gateway Community College - Beginning and Advanced Operating Systems, and various computer program applications.